

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTSFILED
US OFFICE

UNITED STATES OF AMERICA)	2005 SEP 30 P 5:30
)	Criminal No. 05-30008-MAP
)	Criminal No. 05-30009-MAP
)	MAP
v.)	
)	
RONALD CHARLES,)	
Defendant.)	

GOVERNMENT'S MOTION FOR ENTRY
OF AN ORDER OF EXCLUDABLE DELAY

Now comes the United States, by its undersigned attorneys, and hereby moves that the Court enter an Order of Excludable Delay from July 1, 2005 through November 2, 2005 pursuant to 18 U.S.C. §3161(h) (8) (A). The government relies on the following in support thereof.

The Court held a Status Conference on July 1, 2005. During that conference counsel for the defendant requested until September 8, 2005 to file a Motion to Suppress. Subsequently, on September 22, 2005, the defendant requested until October 7, 2005 to file his Motion to Suppress. The Court held a Status Conference on September 30, 2005 during which it allowed the defendant's Motion, gave the government until October 21, 2005 to file a response and established a date of November 2, 2005 for oral argument on the Motion.

The exclusion of this time from the Speedy Trial time period is in the interests of justice. The defendant assents to this motion. Therefore, the government moves that the Court exclude

the time between July 1, 2005 through November 2, 2005 from the speedy trial time period pursuant to 18 U.S.C. §3161(h)(8)(A).

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:


TODD E. NEWHOUSE
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts
September 30, 2005

I, Todd E. Newhouse, Assistant U.S. Attorney, do hereby certify that I have served, by first class mail, a copy of the foregoing, to all counsel of record.


TODD E. NEWHOUSE
Assistant U.S. Attorney